



# Ponti Fire Road-to-Trail Project

## INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

### RESPONSE TO COMMENTS

July 10, 2019

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The Draft Initial Study/Mitigated Negative Declaration was released for a 30-day public review and comment period on April 29, 2019. The comment period concluded on May 31, 2019. The Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) for the Ponti Fire Road-to-Trail Project (proposed Project) was emailed and/or mailed to 966 neighborhood residents, stakeholders, responsible agencies, decision-makers, and individuals who previously expressed interest in receiving such notification. The NOI was posted at the existing public trailheads to the Ponti Fire Road and was posted on the Marin County Open Space District's (MCOSD) website. Public comments were received through an online comment submission format.

MCOSD received 116 comments during the public review and comment period. Of those, the majority supported the proposed Project. Several commenters welcomed the opportunity to volunteer their time to implement the proposed Project. Common reasons for supporting the proposed Project include the following:

- Provides a gentler grade that would be safer for trail users by reducing risk of injury
- Better support the recreational needs of the community
- Design features including reverse grades and rolling dips to remove water from the trail
- Improves environmental conditions by reducing erosion, landslide potential, and habitat fragmentation
- Adding the Pacheco Pathway Connector Trail would provide a recreational trailhead away from residential areas and increase connectivity

The remaining comments asked questions pertaining to the project concept, the environmental analysis included in the Initial Study, and/or requesting minor changes to the Initial Study. These comments and questions are summarized in this Memorandum along with the MCOSD responses. The first two of the responses are specific to comments received from the California Department of Transportation District 4 (Caltrans) and the Federated Indians of Graton Rancheria (FIGR). Comments received from the Marin Audubon Society are addressed under the Biological Resources subheading along with the comments received from individuals regarding biological resources.

### **CALTRANS**

Caltrans recommended that the alignment of the Pacheco Pathway Connector Trail be designed to avoid any grading or vegetation removal from the slope above Pacheco Pathway and commented that the proposed Project's financing, scheduling, implementation responsibilities, and monitoring be fully discussed for proposed mitigation measures prior to the submittal of an encroachment permit.

### **MCOSD Response.**

The MCOSD would not need to remove vegetation or conduct grading activity on the slope above the Pacheco Pathway in order to develop the Pacheco Pathway Connector Trail. A visual simulation of the proposed Pacheco Pathway Connector Trail is shown in Photo 7 on page 21 of the Initial Study. The Pacheco Pathway Connector Trail would be 5-feet wide and developed by removing vegetation within a 10-foot wide corridor then compacting the trail tread.

In addition to the MCOSD Road and Trail Management Plan Best Management Practices that are applicable to the proposed Project, the Initial Study includes four mitigation measures pertaining to Biological Resources and Hydrology and Water Quality:

- Mitigation Measure BIO-1: Special-status and Common Bats

- Mitigation Measure BIO-2: Special-status and Nesting Birds
- Mitigation Measure BIO-3: Seep Protection
- Mitigation Measure BIO-4: Native Trees
- Mitigation measure WQ-1: Erosion and Sediment Control Practices

The MCOSD, as the CEQA Lead Agency, would be fully responsible for financing, scheduling, implementation responsibilities, and monitoring of these mitigation measures. A Mitigation Monitoring and Reporting Plan has been prepared and can be provided to Caltrans. None of the mitigation measures include requirements of other agencies, including Caltrans. The MCOSD submitted an application for an encroachment permit from Caltrans on October 29, 2018, which is required to develop the proposed Pacheco Pathway Connector Trail. The MCOSD is working with Caltrans permit staff to complete the encroachment permit process.

## **FEDERATED INDIANS OF GRATON RANCHERIA**

The Federated Indians of Graton Rancheria (FIGR) recommended the Initial Study include a statement in the Tribal Cultural Resources section of the Initial Study that the tribe would directly notified in the event of an inadvertent discovery.

### **MCOSD Response.**

The MCOSD has added the following statement: “The MCOSD will directly notify the Federated Indians of Graton Rancheria of any inadvertent discovery of cultural or historical resources and of human remains.”

The remaining questions and areas of concern, including those received from the Marin Audubon Society and individuals, are summarized below by topic:

## **1. NEW TRAIL VS EXISTING TRAIL, INCLUDING ACCESS POINTS**

*Several comments suggested that the proposed Project consisted of a new trail and raised concerns about the Ponti Fire Road starting or ending on Redhawk Road and Sage Grouse Road, which are private roads within the Quail Hollow Ridge neighborhood. Specifically, commenters expressed concern that changing the designation from a fire road to multi-use trail would result in increased traffic and other issues within the Quail Hollow neighborhood. Some commenters suggested that the Ponti Fire Road public access be from Alameda del Prado near the existing Ocusun building only, which is within the City of Novato’s jurisdiction.*

### **MCOSD Response.**

The proposed Project consists of realigning the 1.2-mile long upper segment of the existing Ponti Fire Road and re-designate this section to multi-use trail. The trail realignment and re-designation is not a new trail. The proposed Project would also improve the remaining 0.5-mile long lower segment of the existing Ponti Fire Road; decommission the non-designated trail 18645 and segments of the existing Ponti Fire Road and parallel trails that would become redundant after the 1.2-mile long section is re-aligned; and develop a new 0.4-mile long connector trail to the existing Pacheco Hill Pathway. The only new trail connection would be the Pacheco Pathway Connector Trail to the existing Pacheco Hill Pathway, which would provide multi-use public access to the Ponti Fire Road. The change in designation from fire road to multi-use trail applies only to the 1.2-mile long segment of the upper Ponti Fire Road, which does not connect directly with the fire road access points within the Quail Hollow Ridge neighborhood. The 0.5-mile long segment of the lower Ponti Fire Road does connect directly with the fire road access points within the Quail Hollow Ridge neighborhood, and the designation this segment will remain as fire road. Likewise, the proposed Project would not change the designation of the Redhawk Fire Road or Curlew Fire Road, which provide access from the respective private roads owned by the Quail Hollow Ridge Homeowners Association (HOA).

Public recreational access to the Ponti Fire Road from the Quail Hollow Ridge neighborhood is an existing permitted use. A public access easement for pedestrian use exists on the paved section of Redhawk Road,

a private road within the Quail Hollow Ridge neighborhood, and the existing Redhawk Fire Road, which is within the Pacheco Valle Open Space Preserve and provides access to Ponti Fire Road. Redhawk Road is accessed from Alameda Del Prado, which is a public road in the City of Novato jurisdiction. There is no public access to the Ponti Fire Road from Alameda Del Prado or the Ocusun building parking area accessed from Alameda Del Prado. There is no public access from the Sage Grouse Fire Road or Pacheco Creek Drive. The descriptions of public access to the Ponti Fire Road from these locations has been modified on pages 14, 25, 44, and 94.

The MCOSD will change how Sage Grouse Fire Road is shown on its maps. A section is currently shown as a MCOSD multi-use fire road. This will be changed to show Sage Grouse Fire Road as a non-MCOSD fire road. Additionally, MCOSD will re-designate the Redhawk Fire Road to a hiker-only trail to be consistent with the public access easement.

Primary construction access to the project area would be from Heatherstone Drive and Queenstone Drive, which are public roads within unincorporated Marinwood. These are the locations from which all construction equipment would access the project area. Minor construction access to the project area would occur from the Curlew Fire Road accessed from Curlew Road. District vehicles, including operations and maintenance pick-up trucks, would access the project area at this location. No construction equipment would access the project area at this location. The description regarding construction staging in the Initial Study has been modified on page 25 in response to these comments.

The Pacheco Path is an existing 1.2-mile long multi-use pathway between Marinwood and Novato along Highway 101 within Caltrans jurisdiction. The path can be accessed from the intersection of Nave Drive and Alameda del Prado in Novato and the intersection of Miller Creek Road and Marinwood Avenue in Marinwood. The proposed Project would develop the Pacheco Pathway Connector Trail and formalize this as a multi-use public access point. This is the only change to the existing access points to the Ponti Fire Road.

## **2. PROPOSED PROJECT WOULD INCREASE TRAFFIC AND PARKING ON PRIVATE ROADS WITHIN QUAIL HOLLOW RIDGE HOA RESULTING IN A NUMBER OF CONCERNS**

*Several commenters expressed concern that the proposed project would increase traffic on the private roads within the Quail Hollow ridge HOA, including Redhawk Road, Sage Grouse Road, and Curlew Road, which could result in the following impacts that were not considered in the Initial Study:*

- *Increased parking demand and request for MCOSD to conduct a parking demand study*
- *Increased road maintenance needs from increased public use*
- *Increased road maintenance needs from construction equipment*
- *Increase in public nuisance including noise, trash, dog waste, vandalism, and aesthetic impacts*
- *Increased need for police support*
- *Increased cost to the HOA members and increased HOA liability from accidents and injuries*

### **MCOSD Response.**

As stated in the project description, MCOSD anticipates the level and types of recreational use of the project area to remain essentially the same as existing use patterns after implementation of the proposed Project, although the improved conditions could attract a negligible increase in visitor use, as discussed below. The anticipated negligible increase in visitor use would not result in a significant environmental impact. It is anticipated that any new trail users would likely enter from the new trail connection at the Pacheco Pathway and the neighborhood access points would remain the same as current trail use. A public access easement exists on the paved segment of Redhawk Road, which is a private road within the Quail Hollow Ridge neighborhood and provides access to the Ponti Fire Road via the Redhawk Fire Road. The easement is for pedestrian access, meaning that equestrian and bicycle access is not permitted. The MCOSD will re-designate the Redhawk Fire Road to hiker-only trail to be consistent with the public access easement.

The Initial Study includes the following regarding visitor use relative to implementation of the proposed Project:

Visitor use may increase slightly as a result of the improvements to the trail system. A substantial increase in visitor use is not anticipated, primarily because there are not parking facilities provided at Pacheco Valle or Ignacio Valley Open Space Preserves and the proposed Project does not include any parking or other amenities to improve access to the trail system. Since visitors who would drive to Pacheco Valle and Ignacio Valley Open Space Preserves are limited to available on-street parking on public roads, visitor use at these facilities is functionally limited. For these reasons, while an increase in visitor use is anticipated, it is not expected to be substantial and would not contribute to potentially significant environmental impacts. (page 27)

Since visitor use is not expected to increase substantially, the MCOSD does not anticipate an increase in traffic within the Quail Hollow Ridge neighborhood. The private roads include signage stating “private parking only” on the HOA-owned private paved roads including Redhawk Road, Sage Grouse Road, and Curlew Road and therefore, the MCOSD does not anticipate that the public would park on these roads. The private HOA-owned roads are accessed from Alameda del Prado, which is a public road within the City of Novato’s jurisdiction. Alameda del Prado is a circular road and there is existing public parking in designated pull-outs. If the public attempts to access the Ponti Fire Road from Alameda del Prado and cannot find public parking, it is expected that they would simply exit.

Parking facilities are not currently provided at Pacheco Valle Open Space Preserve, and the MCOSD does not have jurisdiction of public roads. For these reasons, along with the determination that visitor use is not expected to increase substantially, a parking demand study is not warranted at this time. Likewise, as public parking is not permitted on the HOA-owned private roads, increased maintenance needs on these roads is not expected due to increased visitor use of the Ponti Fire Road/Multi-Use Trail.

Some commenters expressed concern that the weight of construction vehicles and machinery on the HOA-owned private roads would create increased and unanticipated wear and tear, accelerating the need to repair and maintain these roads. As discussed previously, the Construction Staging discussion included in the Initial Study on page 25 has been clarified to describe primary construction access to the project area, including construction equipment, would be from Heatherstone Drive and Queenstone Drive, which are public roads within unincorporated Marinwood. Minor construction access to the project area would occur from the Curlew Fire Road which is accessed from Curlew Road. District vehicles, including operations and maintenance pick-up trucks, would access the project area at this location. No construction equipment would access the project area at this location. Since no construction equipment would access the project area from the HOA-owned private roads within the Quail Hollow Ridge neighborhood, no damage or maintenance needs are expected to result on these private roads from implementation of the proposed Project.

Some commenters expressed concern regarding law enforcement on the HOA-owned private roads that might be required to address parking violations, injuries, accidents, and vandalism attributed to increased visitor use of the project area. The local fire and police jurisdictions would continue respond to property damage, injuries, or vandalism, same as existing conditions. The proposed Project would install signage, including emergency contact information, at the Redhawk and Curlew Fire Roads at the edge of the MCOSD property, Heatherstone Drive, and Pacheco Pathway. Signage would also include the open space preserve rules and regulations, a detailed map with trail mileage and other wayfinding information, a space for public notices such as upcoming events, hazards, trail closures, and other information; and a magnet message board for the public to share information such as lost and found items. Signage is described on page 20 of the Initial Study.

Currently there are no garbage cans or doggy litter bags at the fire road entrances that are maintained by MCOSD. The MCOSD provides these amenities at facilities that have a demonstrated high visitor use. The Ponti Fire Road has a relatively low visitor use, as determined by field staff, which is not expected to substantially increase as a result of implementation of the proposed project and therefore, the proposed Project does not include installation of garbage bins or doggy litter bags.

One commenter expressed concern regarding increased noise that could result in the Quail Hollow Ridge neighborhood that could result from increased public use of the Ponti Fire Road from the Red Hawk Fire Road access. The Initial Study includes the following discussion on page 96:

As stated in the project description, MCOSD expects the level and types of recreational use of the project area to remain essentially the same as existing use patterns after implementation of the proposed Project, although the improved conditions could attract a nominal increase in visitor use. Increased visitor use could result in increased noise within the project area from recreational use. However, this impact would not be significant for the following reasons: (1) recreational noise would from unamplified voices, the sound of non-motorized bikes, or the sound of horses or dogs; (2) these noise sources are part of the existing condition within the project area; (3) implementation of the proposed Project would not change the existing use of the project area; (4) implementation of the proposed Project would not result in a substantial permanent increase in ambient noise levels compared to existing conditions. As stated in the RTMP EIR, Marin County Code and the MCOSD Code prohibit excessive noise generated by recreational users of the open space preserves.<sup>1</sup> Therefore, implementation of the proposed Project would not result in a substantial permanent increase in ambient noise this impact would be less than significant.

The Marin County Code and the MCOSD Code are enforceable by Marin County Sheriff and MCOSD Rangers.

### **3. INCREASED FIRE DANGER AND DECREASE IN FIRE PROTECTION**

*Several commenters expressed concern that the proposed project would increase fire danger from increased visitation and from decreasing the width of the upper segment of the Ponti Fire Road from the existing 14 feet to 5 feet.*

#### **MCOSD Response.**

Some commenters expressed concern that the proposed Project would increase ignitions from cigarettes, illegal campfires associated with homeless encampments, and arson. As discussed previously, MCOSD does not anticipate a substantial increase in visitation to the Ponti Fire Road as a result of the proposed Project. The MCOSD rangers would continue to regularly patrol the project area and respond to MCOSD code violations. Emergency contact information would be included at Redhawk and Curlew Fire Roads, Heatherstone Drive, and Pacheco Pathway.

Some commenters expressed concern with the proposed design of the upper segment of the Ponti Fire Road, which includes narrowing the existing fire road from 14 feet to 5 feet and re-designating this section of fire road to multi-use trail. Concerns include lack of access for fire-fighters and lack of egress for Quail Hollow Ridge residents in the event of a wildfire because the only road available is Alameda Del Prado as well as decreasing the width of the fuel break created by existence of the fire road.

The proposed Project was designed in collaboration with the Marinwood Community Services District (CSD), and the Marin County, Marinwood, and City of Novato Fire Departments to ensure that no emergency access points or evacuation routes were eliminated. This consultation is described on page 14 of the Initial Study. As a result of these meetings, it was determined that the Ponti Fire Road is located primarily within the Marinwood CSD, it could be potentially unsafe for emergency vehicle access, and is a low priority as a strategic fuel break for the adjacent neighborhoods. The MCOSD is partnering with the local fire agencies and working with neighborhoods adjacent to the MCOSD open space preserves to collectively achieve the defensible space requirements and enhance community wildfire protection. The MCOSD and the local fire agencies will continue to maintain safe emergency access for the City of Novato Fire Department all-terrain vehicles (ATVs) for fire and emergency crews along the upper segment of the Ponti Fire Road. The proposed Project would narrow the upper segment of the Ponti Fire Road to a 5-foot width which would provide ATV accessibility for fire and emergency crews, which is described on page 19 of the Initial Study. Based on the MCOSD's consultation with these entities and by incorporating the request of the City of Novato Fire Department's request for ATV access, the MCOSD determined that the proposed

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<sup>1</sup> MCOSD, 2014a

Project would not negatively affect response in case of wildfire and would benefit emergency access (Initial Study, page 105)

The MCOSD creates and maintains fuel breaks within open space preserves, around safe and appropriate emergency access roads, and around homes and neighborhoods where the fuel break can be effectively maintained and used during a fire. Within Pacheco Valle and Ignacio Valley Open Space Preserves, emergency access and vegetation management will continue along Chicken Shack Fire Road, with fuel reduction activities adjacent to Pacheco Valle and Marinwood neighborhoods.

The local fire agencies do not endorse the use of any fire roads in Marin County open space preserves as an evacuation route, and, the Ponti Fire Road has not been used for this purpose and it would not be feasible to do so. As such, implementation of the proposed Project would not eliminate any evacuation routes from the Quail Hollow Ridge neighborhood. The MCOSD works with local and county fire agencies to maintain a network of emergency access routes and fuels management areas that support fast responses, decrease risk, and enhance strategic capability to manage wildfires when they occur. Coordinating directly with fire departments ensures that fire history, risk, and response needs are integrated into the planning process for natural areas adjacent to communities.

There were small grassland fires that occurred along the Pacheco Pathway in 2014 and 2015, all contained at less than 5 acres. The MCOSD considers fire history in terms of future fire risk assessment. Regardless of fire history, MCOSD and the local fire agencies know that there is always a risk of fire starting anywhere at any time, so actions are taken to reduce wildfire risk and to enhance the ability to respond to future wildland fires on MCOSD properties. The proposed Project would achieve these goals by re-aligning the upper segment of the Ponti Fire Road to create a safe and sustainable route for ATV access by emergency personnel.

The Initial Study includes the following analysis regarding fire and emergency access after the proposed Project is implemented. The MCOSD does not propose any changes to this analysis.

The existing upper segment of the Ponti Fire Road is in very poor condition and is not used by local fire departments to provide emergency services. The proposed Project would improve this section of fire road that would be accessible for ATVs and other off-road vehicles in cases of emergency. MCOSD has met with the Marinwood CSD, City of Novato, and Marin County fire departments on several occasions over the past 2 years to discuss the proposed Project. Through staff conversations the local and county fire departments have confirmed that the conversion of the upper segment of the existing Ponti Fire Road to a trail would not affect firefighting operations. The fire departments all share the sentiment that the upper Ponti Fire Road is a dangerously situated road that offers little strategic value to wildland fire fighting. Furthermore, deploying firefighting personnel on the upper segment of the Ponti Fire Road would place staff at unnecessary safety risks. The critical lower segment of the Ponti Fire Road which is adjacent to homes would remain as a serviceable fire road for fire and emergency service vehicles and would be improved as part of the project. The section portion of the Ponti Fire Road would remain accessible to ATV emergency vehicles for search and rescue and medical emergencies. During construction, access to the project area would be more limited because of construction equipment and personnel; however, the trails would be closed to recreation and emergency access would be maintained during construction. After construction, use of the project area for recreation would continue similar to current conditions. The proposed Project would improve access for rangers and emergency responders on foot or using ATVs. Overall, implementation of the proposed Project would have a beneficial impact on emergency access. (page 105)

Implementation of the proposed Project would not interfere with established emergency response plans or emergency evacuation plans.<sup>2</sup> MCOSD has closely coordinated with all local fire departments who share the sentiment that the upper Ponti Fire Road is a dangerously situated road that offers little strategic value to wildland fire fighting. Furthermore, deploying firefighting personnel on the upper segment of the Ponti Fire Road would place staff at unnecessary safety risks. The critical lower segment of the Ponti Fire Road which is adjacent to homes would remain as a serviceable fire road for fire and emergency service vehicles and would be improved as part of the project. The upper segment

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<sup>2</sup> City of Novato, 2009; Marin County, 2007

of the Ponti Fire Road would remain accessible to ATV emergency vehicles for search and rescue and medical emergencies. Implementation of the proposed Project would not change or disrupt vehicular or pedestrian traffic in the site vicinity in a way that would have the potential to interfere with emergency response or evacuation. For these reasons, implementation of the proposed Project would not impair an adopted emergency response plan or emergency evacuation plan. (page 112)

One commenter expressed concern that re-designation of the upper segment of the Ponti Fire Road to multi-use trail would result in Marin County Fire Department not making improvements to the fire access to several neighborhoods, which in turn would decrease response time. Since the Marin County Fire Department participated in consultations with MCOSD regarding the proposed Project, including the proposed re-designation of the upper segment of the Ponti Fire Road to multi-use trail, it is not anticipated that this change would affect the Marin County Fire Department's improvements to fire access in residential neighborhoods.

#### **4. GENERAL CONCERNS REGARDING THE PROPOSED PROJECT**

*Some commenters expressed concerns regarding narrowing the width of the upper segment of the Ponti Fire Road from 14 feet to 5 feet and re-designating this segment to multi-use trail, questioning if 5 feet is adequate width to accommodate hikers, equestrians, and cyclists. One commenter asked if blind curves could be eliminated to further reduce multi-use conflicts. One commenter Consider suggested creating two one-way directional segments - one up and one down – to lessen conflicts*

##### **MCOSD Response.**

There is no absolute standard width for a multi-use trail. For example, the California State Parks design requirements for a multi-use trail specifies a minimum trail width consistent with the Class 1 equestrian standard of 36 inches with passing areas, if needed, where hillslopes are steep and hikers and cyclists may have difficulty stepping off the trail for an equestrian.<sup>3</sup> The 5-foot trail width proposed for the upper segment of the existing Ponti Fire Road has been determined adequate for the multi-use trail designation based on several factors including desire to reduce environmental impacts on sensitive resources by reducing sedimentation and erosion and by establishing a sustainable system of roads and trails that would provide year-round public access. The proposed 5-foot trail width would allow for passing of two user groups on the trail surface and would provide ATV access by emergency personnel. Narrowing the existing 14-foot trail width to 5 feet, along with re-aligning the existing steep trail grade to a more sustainable grade, would improve trail safety, reduce sedimentation and erosion, improve water quality, and reduce habitat fragmentation.

The proposed design of the upper segment of the Ponti Fire Road is consistent with the Road and Trail Standards included in the RTMP and input provided by Timothy C. Best who prepared the Engineering Geologic and Geotechnical Assessment for the proposed project. The reduced grade of the proposed realignment of the upper segment of the Ponti Fire Road and inclusion of design features is expected to reduce blind curves and generally improve safety of the trail. The proposed project does not include directional segments, because the natural resource impacts of redundant directional trail segments in this location would be inconsistent with the goals of the RTMP.

#### **5. BIOLOGICAL RESOURCES**

*Several commenters expressed concerns and asked questions regarding biological resources, summarized below:*

- *Discuss the studies conducted to assess environmental impacts to biological resources, including during the construction period and how these impacts would be mitigated during construction*
- *Discuss the effect of more mountain bikes and horses on the trail that could increase the spread of non-native species by transmitting seed from invasive plants, which would displace native species*

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<sup>3</sup> [http://www.parks.ca.gov/?page\\_id=29174](http://www.parks.ca.gov/?page_id=29174)

*and increase cost of vegetation management on the Quail Hollow Ridge neighborhood and increase fire danger*

- *The proposed Project should include a goal of eliminating French broom from the project area. Clarify whether implementation of the Invasive Species Management Best Management Practices would ultimately eliminate French broom from the Preserve.*
- *Discuss the construction-related and long-term impacts to habitat of plants and animals, including special status species and species without special status*
- *Discuss the impact on nesting birds*
- *Regarding northern spotted owl:*
  - *Change Road and Trail Management Plan (RTMP) Best Management Practices (BMP) Special Status Wildlife-4: Avoidance and Protection of Northern Spotted Owl including to denote nesting season February through July instead of March through September*
  - *Define how occupied habitat is defined: is it a core area, nest, or nest area*
  - *Do not remove nest trees*
  - *Recommended distance from a nest area is ¼ mile. Project should avoid habitat if northern spotted owl is found in the project area*
- *Impact to dusky footed woodrat not discussed. Has this species been found in the project area? Include a requirement that woodrat houses be protected, if found*
- *Coast live oak woodland and chemise chaparral should be considered sensitive natural plant communities and impacts on these habitats should be addressed*
- *Protect the wildflowers that bloom at the intersection of the Ponti Fire Road and Curlew Fire Road, which extend approximately 80 feet from the center of the intersection in each direction*

### **MCOSD Response.**

The MCOSD staff biologists surveyed the project area and completed site assessments during project development. Additionally, the MCOSD conducted two assessments prepared by consultants, which are described in the Initial Study beginning on page 45. The proposed realignment of the upper segment of the Ponti Fire Road was designed to avoid potential impacts to biological resources. The biological resources section of the Initial Study is based on MCOSD staff assessments and the consultant studies.

**Invasive species management:** A substantial increase in visitor use, including that of equestrians and bicyclists, is not expected to result from implementation of the proposed Project. Invasive species management is discussed in the Initial Study beginning on page 65. As stated in the Initial Study, "... implementation of the proposed Project would involve equipment operation, grading, and other disturbances that could result in the introduction or spread of invasive plant species along the corridor where the upper segment of the Ponti Fire Road would be realigned, which could result in the spread of invasive species into adjacent areas." The RTMP BMPs that address invasive plants would be incorporated into the proposed project. With implementation of RTMP BMPs Invasive Plants 1 through 10, the Initial Study concluded that invasive species, including French broom, would not increase and that no additional mitigation measures would be required. The widespread elimination for French broom and other invasive species within all the open space preserves is a comprehensive goal being pursued by the MCOSD. This is a long-term effort that is beyond the scope of the proposed Project. The MCOSD will prioritize the two stands of French broom that have been identified within the project area for monitoring and management consistent with the Invasive Species Management BMPs included in the RTMP and the Initial Study.

**Construction-related and long-term impacts to habitat:** The proposed Project implements the MCOSD's Road and Trail Management Plan (RTMP), which includes Best Management Practices (BMPs) to address both construction-related and long-term impacts to biological resources. The Initial Study recommends implementation of mitigation measures which clarify and augment these BMPs. The Initial Study concluded that implementation of the proposed Project would not result in long-term impacts to habitat. The proposed Project has been designed to minimize disturbance to vegetation and habitat,

including tree removal. The Initial Study includes Mitigation Measure BIO-4: Native Trees to address pruning, the tree root protection zone, and tree replacement in the event that trees require removal to implement the proposed Project. With implementation of Mitigation Measure BIO-4: Native Trees, the Initial Study concluded that the proposed Project would result in a less than significant impact to trees. The Initial Study also includes Mitigation Measure BIO-1: Special-status and Common Bats, and BIO-2: Special-status and nesting Birds, BIO-3: Seep Protection to address potential construction-related impacts that could result from project implementation that are not addressed by RTMP BMPs.

Implementation of the proposed Project would remove understory vegetation, and cause soil disturbance and compaction as described on page 61 of the Initial Study. In total, approximately 84,000 square feet of disturbance would occur to realign the upper segment of the Ponti Fire Road and develop the new Pacheco Pathway Connector Trail. Decommissioning of the segments of portions of the existing alignment of the upper segment of the Ponti Fire Road that would become redundant after the realignment and decommission of undesignated trail 18645 would restore approximately 127,000 square feet of area. The restored area would exceed the newly disturbed area by approximately 43,000 square feet which would benefit sensitive and non-sensitive vegetation communities, birds, and other wildlife. The proposed Project would reduce the overall recreation area that human visitors would occupy in Pacheco Valle Open Space Preserve by focusing recreation on one designated trail instead of the existing spider web of social trails and unsustainable fire roads. Additionally, the realigned upper segment of the existing Ponti Fire Road would reduce erosion, landslide potential, and water quality degradation which would in turn benefit biological resources. For these and other reasons, the Initial Study concluded that implementation of the proposed Project would not result in long-term impacts to biological resources.

**Nesting birds and northern spotted owl:** The Initial study discusses potential impacts that could result from project implementation to special-status and nesting birds beginning on page 58, and recommends implementation of Mitigation Measure BIO-2: Special-status and Nesting Birds. With implementation of Mitigation Measure BIO-2: Special-status and Nesting Birds and the applicable RTMP BMPs, the Initial Study concluded that implementation of the proposed Project would not result in significant impacts to nesting birds. In addition to the biological resources studies previously mentioned, MCOSD contracted with Point Blue Conservation Science to conduct focused protocol-level surveys for northern spotted owls within the suitable habitat, within a ¼-mile radius of the project area over a two-year period. No northern spotted owls were heard or observed during these surveys. Table 6: Guideline Buffers by Species or Guild on page 60 of the Initial Study clarifies the nesting season from northern spotted owl as February 1 – July 31 and defines the buffer area as ¼ mile. Table 6 would be used to implement Mitigation Measure BIO-2: Special-status and Nesting Birds and supersedes RTMP BMP Special Status Wildlife-4: Avoidance and Protection of Northern Spotted Owl. As described in Mitigation Measure BIO-2: Special-status and Nesting Birds, the buffer area would be based upon location of an active nest or breeding activity which would be discovered through pre-construction surveys occurring within seven days of the start of active ground-disturbing activity. No trees would be removed within the buffer area during nesting season or while nests are active, consistent with RTMP BMPs including Special-Status Wildlife 3: Seasonal Restrictions During Bird Nesting Season. With implementation of the RTMP BMPs and the Mitigation Measures, the Initial Study concluded that no significant impacts would result in the area of biological resources.

**Dusky-footed woodrats:** No woodrat houses were identified by MCOSD staff biologists or by the consulting biologists during site assessments conducted during project development. On page 57 of the Initial Study, the MCOSD commits to implementing RTMP BMP General-7: Include Standard Procedures in Construction Contracts, which includes a provision to protect environmentally sensitive areas such as woodrat nests. Implementation of this BMP requires MCOSD staff biologists to identify environmentally sensitive areas within or near the project area prior to the initiation of ground-disturbing activities, which would include woodrats. If dusky-footed woodrat nest(s) are identified during the pre-construction survey, they would be protected as required by RTMP BMP General-7: Include Standard Procedures in Construction Contracts.

**Coast live oak woodland and chemise chaparral:** The Initial Study includes Table 5: Special Status Plant Species and natural Communities within the Project Area on page 48 which identifies the coast live oak woodland and chemise chaparral plant communities as non-sensitive. This designation is based on California Native Plant Society (CNPS) and California Department of Fish and Wildlife (CDFW) rankings and inventories and it essentially means that these plant communities have a wide enough distribution that they are not at risk of elimination. The MCOSD values these plant communities regardless of the CNPS and CDFW designations, and the proposed Project has been designed to minimize impacts within them.

**Wildflowers at intersection of Ponti and Sage Grouse Fire Roads:** As stated in the Initial Study, all applicable RTMP BMPs will be implemented including those that require pre-construction surveys and protection of sensitive species.

## **6. RUN-OFF, DRAINAGE, AND LANDSLIDE POTENTIAL**

*Some commenters expressed concern that the project would increase runoff from new pavement which would impact the private roads owned by Quail Hollow Ridge HOA, impact the associated drainage systems, and increase the likelihood of landslides onto the Quail Hollow Ridge neighborhood.*

### **MCOSD Response:**

There is no new pavement proposed as part of the Project. The upper segment of the Ponti Fire Road proposed for realignment and decommissioning of redundant trail sections has a history of landslides, the most recent having occurred in 2005 and resulted in property damage. In 2017, there were observations of continued geologic instability in another location of the upper segment of the Ponti Fire Road. The proposed Project has been designed to improve the hydrologic function of the trail making it “hydrologically invisible” meaning that as water flows down a slope and interfaces with a trail, the water keeps flowing as if the trail was “invisible,” ensuring that as water flows over the improved trails, it does not result in rills, gullies, or erosion that could lead to instability and landslides. The proposed Project would minimize the risk of future landslides caused by the unmanaged hydrologic drainage of the Ponti Fire road. The new Pacheco Pathway Connector Trail would be developed by removing vegetation within the respective trail alignment and compacting the soil for recreational use. Furthermore, MCOSD consulted with a geologist to review the proposed Project and prepare a study and designs to ensure geologic stability of the proposed project<sup>4</sup>. For these reasons, the Initial Study concluded that implementation of the proposed Project would not result in increased runoff, erosion, or landslide potential and would instead reduce the risk of future erosion and landslides.

## **7. PROPOSED DECOMMISSION OF UNDESIGNATED TRAIL 18645**

*A few commenters express concern and general lack of support for the proposed decommissioning of undesignated trail 18645 in Ignacio Valley Open Space Preserve because it provides challenging technical trail due to its steepness. If it must be decommissioned, construct the other trail improvements first.*

### **MCOSD Response:**

The purpose of the proposed Project is to implement the RTMP to provide the public with a safe multi-use trail system to enhance the visitor experience, reduce the environmental impacts on sensitive resources, and establish a sustainable system of roads and trails that meet design and management standards and would provide year-round access along the trail alignment. One of the ways that the proposed Project would meet the intent of the project purpose is decommissioning Trail 18645, which is an extremely steep and unsustainable trail that was not designated through the 2016 Region 3 public process for road and trail designations. Decommissioning of Trail 18645 would occur after both phases of the Ponti Fire Road improvements are implemented.

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<sup>4</sup> Best, Timothy C. CEG Engineering, Geology, and Hydrology. Engineering Geologic and Geotechnical Assessment Ponti Fire Road to Trail Conversion Project. September 2018.

## **8. RE-ALIGNMENT AND CHANGED DESIGNATION OF THE UPPER SEGMENT OF THE PONTI FIRE ROAD**

*Some commenters expressed concern and general lack of support for realigning the upper segment of the Ponti Fire Road because it would change the rugged character of the existing experience, the realigned trail would be less challenging, and because the lengthened trail would take more time to hike. One commenter expressed concern and general lack of support for the proposed change in designation of the upper segment of the Ponti Fire Road to multi-use trail because it would remove this segment from off-leash dog use.*

### **MCOSD Response:**

One of the primary goals for the proposed realignment of the upper portion of the Ponti Fire Road is to reduce the existing 20-35 percent slope to a sustainable grade of less than 10 percent which would reduce environmental impacts of the trail, such as erosion, sedimentation, water quality, landslide potential, and habitat fragmentation. The realignment would also replace a steep former ranch road with a comfortably graded trail developed for a recreational experience. The MCOSD constructs and maintains a variety of styles of trails from primitive and rugged to a more inclusively accessible trail with a firm a stable surface compliant with the MCOSD's Inclusive Access Plan. The proposed Project will maintain a certain ruggedness similar to the Big Rock Trail due to the steep topography of the site. The proposed realignment of the upper segment of the Ponti Fire Road would add approximately 1.2 miles to the trail while reducing the steepness of the grade. It is difficult to predict whether the realigned trail would require additional time to hike, and if so, how much time would be added.

The upper segment of the existing Ponti Fire Road would be re-designated to multi-use trail which would require dogs to be on-leash in this segment. The lower 0.5-mile section of Ponti Fire Road will remain designated as a multi-use road and will remain available as an off-leash dog walking area.

## **9. PROJECT ALTERNATIVES AND FUTURE PROJECT SUGGESTIONS**

*Some commenters shared ideas regarding project alternatives including the following:*

- *Create an emergency only access from the Ocusun building off Alameda del Prado*
- *Do not re-designate from fire road to multi-use trail – install a retaining wall to address the landslide issue and preserve access for fire protection*
- *No project -leave the trails as they are and spend the money on maintenance, such as removing dead wood to reduce fire hazard*
- *Fix drainage problems at the intersection of the Ponti Fire Road and trail 20415, otherwise known as Sage Grouse Fire Road, as water has been observed to run down the road and seep out of the hillsides during the wet season. The commenter suggested an extension of the asphalt speed bump which acts as a water diversion, by 2-to-four feet and potentially a parallel speed bump/water diversion within three feet of the uphill side.*
- *Consider future similar projects for Chicken Shack Fire Road*
- *Consider providing access to Big Rock Ridge for the northwest side of the ridge*

### **MCOSD Response:**

The proposed Project was developed over time and with public involvement, beginning with RTMP Region 3 Proposed Trail Designation Process in 2016. A result of this process included the proposed conditional designation of the upper segment of the Ponti Fire Road as “Road to Multiuse Trail Conversion subject to re-alignment” and the lower segment to remain as “Multiuse Fire Road,” and did not designate trail 18645 as part of the MSOSD trail system. After the Region 3 Proposed Trail Designation Process was complete, MCOSD commissioned a preliminary trail report by Timothy C. Best, CEG Engineering Geology and Hydrology to evaluate the engineering, geologic, and geotechnical feasibility of the proposed project. The scope of the study included:

- Review of the proposed trail alignment as identified by MCOSD staff;

- Evaluation of geologic and geotechnical constraints associated with realigned trail construction and road to trail conversion;
- Qualitative assessment of the implications of the trail on erosion and slope stability; and
- Development of conceptual recommendations for trail construction.

MCOSD staff conducted site reconnaissance and meetings with stakeholders to solicit feedback regarding the proposed project, which was discussed beginning on page 15 of the Initial Study. The public comment period for the draft Project Description for the proposed Project was conducted November 7 – December 7, 2018 and the MCOSD hosted a public meeting at the Marinwood Community Services District on November 13, 2018. A total of 25 comments were received during the public comment period. A summary of the comments received and MCOSD responses was published on February 12, 2019.

The purpose of the proposed Project is to implement the RTMP to provide the public with a safe multi-use trail system to enhance the visitor experience, reduce the environmental impacts on sensitive resources by reducing sedimentation and erosion, and establish a sustainable system of roads and trails that meet design and management standards and would provide year-round access along the trail alignment.

The proposed Project, as described in the Initial Study, would meet the intent of the project purpose by re-aligning the upper segment of the existing Ponti Fire Road to develop a sustainable trail and decommissioning trails that were not designated as part of the Region 3 proposed trail designation process, non-designated trails that are parallel to the existing Ponti Fire Road, and portions of the Ponti Fire Road that will become redundant after the upper segment of the existing Ponti Fire Road is re-aligned. The upper segment of the existing Ponti Fire Road no longer supports emergency vehicles and is in a state of disrepair. Realigning the upper segment of the existing Ponti Fire Road would achieve the project purpose by reducing the trail grade, which currently exceed 30 percent and reducing the trail width, which is currently wider than is needed to support recreational use. Implementation of these improvements would enhance visitor experience by improving trail safety and would reduce environmental impacts on sensitive resources by establishing a sustainable trail system that meet design and management standards, reduces sedimentation and erosion, and improves water quality. The proposed decommissioning of existing fire road that would become redundant and non-designated trails would achieve the project purpose by establishing a sustainable trail system that meet design and management standards. In doing so, the environmental impacts on sensitive resources would be minimized by reducing sedimentation and erosion, which in turn, would improve water quality.

The project alternatives suggested by commenters, described in the comments summary, would not meet the purpose of the proposed Project because they would not implement the proposed trail designations that resulted from the Region 3 Proposed Trail Designation Process, are not within MCOSD's jurisdiction to implement, or are not feasible at this time. Furthermore, implementation of the proposed Project, particularly the re-alignment of the upper segment of the Ponti Fire Road and the proposed trail decommissioning would improve environmental conditions by reducing erosion, sedimentation, and landslide potential. These conditions currently existing on the steep grades of the upper segment of the Ponti Fire Road and undesignated trail 18645.

The suggestions for future projects, including realignment of Chicken Shack Fire Road, providing access for the northwest side Big Rock Ridge, and remedying potential drainage issues on Sage Grouse Road are outside the scope of the proposed Project.

- The MCOSD has considered all comments received during the 30-day public review period for the proposed Project. This document presents summaries of the comments received and the MCOSDs responses to those comments. The MCOSD has made minor edits to the Initial Study to clarify the narrative and they do not result in a substantial revision as defined in CEQA Guidelines Section 15073.5 that would require recirculation of the document. Specifically, no new, avoidable significant effects, mitigation measures, or project revisions were added to reduce the effect to insignificance. The edits pertain primarily to the clarification of public access and construction access on pages 14, 25, 44, and 93 and adds the following clarifying statement in the Tribal Cultural Resource section of the Initial Study

Checklist: the following statement: “The MCOSD will directly notify the Federated Indians of Graton Rancheria of any inadvertent discovery of cultural or historical resources and of human remains.”

- Based on the conclusions included in the Initial Study, the comments received during the public review period and responses to those comments, the MCOSD will adopt the proposed Mitigated Negative Declaration as it finds, on the basis of the whole record, that there is no substantial evidence that the project will have a significant effect on the environment and the Mitigated Negative Declaration reflects the MCOSD’s independent judgment and analysis. A Notice of Determination will be filed consistent with CEQA Guidelines Section 15075: Notice of Determination on a Project for which a Proposed Negative or Mitigated Negative Declaration has been Approved.

## **CHANGES TO THE INITIAL STUDY**

The following minor changes have been made to the Initial Study. Deleted text is shown in red, strike-out and added text is shown in blue.

### **Page 14 – under Existing Setting**

#### **Ponti Fire Road**

The Ponti Fire Road is a native ground-surface trail that runs east-west along the crest of Ponti Ridge along the southern boundary of Pacheco Valle Open Space Preserve and the adjacent northern boundary of the Marinwood County Services District open space property. Ponti Fire road is approximately 1.75-mile long and 14-foot-wide. It extends from the end of Heatherstone Drive in Marinwood, up the Big Rock Ridge to Chicken Ranch Fire Road on the ridge between the Pacheco Valle and Ignacio Valley Open Space Preserves. It is used for year-round recreational trail use and maintenance vehicle use. ~~It and~~ is accessible from Redhawk ~~and Sage Grouse Fire Roads Pacheco Creek Drive in Pacheco Valle~~, which ~~are~~ ~~is~~ accessed from a private road in the Quail Hollow Ridge neighborhood upon which there is a private access easement, ~~multiuse fire roads~~ and from Heatherstone Drive, which is a hiking only trail, in Marinwood.

The Ponti Fire Road serves as the watershed divide between Pacheco Creek to the north, a tributary to Novato Creek, and Blackstone Canyon Creek to the south, a tributary to Miller Creek. ~~both watersheds drain to San Pablo Bay. There are scenic vistas of the San Francisco Bay and Mount Tamalpais from multiple vantage points within the project area.~~ Elevations climb from 240 feet at the lower trailheads to 1,310 feet at the intersection with Chicken Shack Fire Road at the Big Rock Ridge ridgeline. Much of the surrounding land is inaccessible and drops precipitously into rugged, wooded canyons.

### **Page 25 – under Project Description**

#### **Construction Staging**

Construction staging areas would be restricted to existing MCOSD roads and trails and other areas that would avoid any significant impacts on sensitive natural resources, as required by RTMP Best Management Practices (BMPs). Access to the project site for construction vehicles and equipment would be from ~~Chicken Shack Fire Road, Little Cat Fire Road,~~ Queenstone Fire Road ~~and Heatherstone Drive, which are public roads within unincorporated Marinwood. These are the locations from which all construction equipment would access the project area. Minor construction access to the project area would occur from the Curlew Fire Road, which is accessed from Curlew Road. District vehicles, including operations and maintenance pick-up trucks, would access the project area at this location. No construction equipment would access the project area at this location. Sage Grouse Fire Road, Red Hawk Fire Road, and Heatherstone Drive.~~ During construction, the MCOSD would limit and close trail access for safety purposes and would install signs at preserve entrances to warn trail users. The project area would remain accessible to all emergency vehicles.

#### **Construction Activities**

Construction of the project would adhere to the Road and Trail Standards and BMPs outlined in Chapter 6 of the RTMP. Construction would be multi-phased to accommodate timing requirements due to sensitive species, as discussed in the Biological Resources section of the Initial Study Checklist. Construction is expected to begin in 2019 and would extend into 2020 and possibly 2021. Phase 1 would include the middle portion of the Upper Segment of the Ponti Fire Road re-alignment. Phase 2 would include the remainder of the proposed Project. Phasing of the proposed Project is shown on Figure 7 – Project Phasing. Trail decommissioning would occur after the upper segment of the Ponti Fire Road is realigned.

### **Page 44 – under Biological Resources, Setting**

Ponti Fire Road traverses the Pacheco Valle Preserve, to the north, and the Marinwood Open Space, to the south. The road follows the ridgeline in an east-west direction for approximately 1.75 miles. Elevations climb from 240 feet at the lower trailheads to 1,310 feet at the intersection with Chicken Shack Fire Road at the ridgeline. It is accessible from Redhawk Fire Road, which is accessed from a

private road in the Quail Hollow Ridge neighborhood upon which there is a private access easement and Sage Grouse Roads, Pacheco Creek Drive in Pacheco Valle, which are multiuse fire roads, and from Heatherstone Drive, which is a hiking only trail, in Marinwood. The Ponti Fire Road passes through annual grassland, mixed woodland, and chaparral habitats. Much of the surrounding land is inaccessible and drops precipitously into rugged, wooded canyons. The fire road serves as the watershed divide between Pacheco Creek to the north, a tributary to Novato Creek, and Blackstone Canyon Creek to the south, a tributary to Miller Creek; both watersheds drain to San Pablo Bay. It provides scenic vistas of the San Francisco Bay and Mount Tamalpais from multiple vantage points.

#### **Page 94 – under Land Use and Planning, Setting**

The project area is located within the Pacheco Valle and Ignacio Valley Open Space Preserves, which are within City of Novato jurisdiction, and on Marinwood Community Service District open space property, which is within unincorporated Marin County jurisdiction. Pacheco Valle Open Space Preserve is surrounded by single-family residential development in the unincorporated neighborhoods of Marinwood and Lucas Valley to the south and by the Loma Verde Open Space Preserve to the north. Access to the project site is from Heatherstone Drive in Marinwood and Sage Grouse Fire Road, Red Hawk Fire Road, and Curlew Fire Road accessed from a private road in the Quail Hollow Ridge neighborhood off Alameda del Prado in Novato. There is limited on-street parking on the public streets in the vicinity of Pacheco Valle Open Space Preserve but no dedicated parking.

#### **Page 108 – Under Tribal Cultural Resources**

There are no sites within the project area that are listed or eligible for listing in the California Register of Historic Resources<sup>5</sup> or in a local register of historical resources as defined in PRC Section 5020.1(I). No historical resources were found within the study area by the cultural resources report prepared for the project.<sup>6</sup> Therefore, implementation of the proposed Project would not result in a substantial adverse change in the significance of a tribal cultural resource landscape listed or eligible for listing on the California Register of Historical Resources. The MCOSD would directly notify the Federated Indians of Graton Rancheria of any inadvertent discovery of cultural or historical resources and of human remains.

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<sup>5</sup> CDPR, 2019

<sup>6</sup> Origer, 2019



# INDEX OF COMMENTS RECEIVED

Comments were received from the agencies, organizations, and individuals included in the following table. Comments are listed in the date order of receipt. The majority of the comments supported the proposed Project, as indicated by an “X” in the “Support” column. Comments that communicated concerns and questions, which are responded to in the Response to Comments (RTC) document, are indicated by an “X” in the remaining columns relating to the list below.

Column	Topic Area	RTC Page Number
1.	New Trail vs. Existing Trail, Including Access Points .....	2
2.	Proposed Project Would Increase Traffic and Parking on Private Roads Within Quail Hollow Ridge HOA Resulting in a Number of Concerns .....	3
3.	Increased Fire Danger and Decrease in Fire Protection .....	5
4.	General Concerns Regarding the Proposed Project.....	6
5.	Biological Resources .....	7
6.	Run-Off, Drainage, and Landslide Potential .....	9
7.	Proposed Decommission of Undesignated Trail 18645 .....	10
8.	Re-Alignment and Changed Designation of the Upper Segment of the Ponti Fire Trail .....	10
9.	Project Alternatives and Future Project Suggestions .....	10

Commentor	Support	Agency	1	2	3	4	5	6	7	8	9
<b>Agencies and Organizations</b>											
Patricia Maurice. District Branch Chief. CA Department of Transportation, District 4		Caltrans									
Buffy McQuillen. Tribal Heritage Preservation Officer. Federated Indians of Graton Rancheria		FIGR									
Barbara Salzman. Marin Audubon Society							X				
Vernon Huffman, Access 4 Bikes	X										
Tom Boss, Marin County Bicycle Coalition	X										
<b>Individuals</b>											
James Roberts	X										
Jackson Ratcliffe	X										
Cory Sullivan									X		
K Pedersen						X					
Lloyd Miller	X										
Gavin Blair	X										
Mark Reed	X										
Thomas Schmidt	X										
Jason Matthies	X										
John Lauster	X										
Joseph Weisshaar	X										
Mark Friedman	X										
Michael McIntyre	X										
Roger Noyes	X										
Scott Murray	X										

<b>Commentor</b>	<b>Support</b>	<b>Agency</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>	<b>8</b>	<b>9</b>
Donald Clark	X										
Galen Pewtherer	X										
Matt Young	X										
Todd Berringer	X										
Zaida Aronovsky	X										
Albert Szilvasy	X										
Jan Krizek	X										
James Malaspina	X										
Andrew Chance	X										
Steve Small			X	X							
Philip Scott			X	X			X				
Max K					X						
Freddie Foster	X										
Gary Bennett							X	X			
Herbert Herzog	X										
Richard Burger	X										
Thomas Boss	X										
Chris Lauzon	X										
Donald Johnson	X										
Glenn McDonald	X										
Maureen Gaffney	X										
Michael McGee			X				X	X			X
Nick Shorten	X										
John Boeschen	X										
Tad Jacobs	X										
Bill Abright	X										
Jeff Troutner	X										
Patrick Ritter	X										
Brian Popplewell	X										
Christine Anderson	X										
Chris Stanley	X										
David Carbonell	X										
Gary McConnell	X										
Geoffrey Sears	X										
Jeff Vickers	X										
Jeff Weidner	X										
Kris Bradley											X
Morris Beazley	X										
Michael Fernandez-Malone	X										
Michelle Greer	X										
Matthew Muldoon	X										
Matt Selig	X										
Richard Lee	X										

<b>Commentor</b>	<b>Support</b>	<b>Agency</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>	<b>8</b>	<b>9</b>
Sean DeBruine	X										
Timothy Rodden	X										
T. Bangart			X	X	X	X	X				
Shannon Moore	X										
Bob Roehm	X										
Marcia Meyers	X										
Matt Sellers	X										
Nan Watanabe			X	X	X	X	X	X			
Danny Forer	X										
Kim Obrien	X										
Phil Tiso	X										
Michael Lipson	X										
Jeff Landry	X										
Patrick McNicholas	X										
Tracy Davis	X										
Kristen McGee			X	X							X
Michael Krieger						X			X		
Christine VanDyke			X	X		X	X				X
Helen Marrks						X					
Marijke Ross											X
N. Bellinger				X		X					
Elsie Huey			X	X							X
Dave Skinner	X										
Ethan Schwartz	X										
Lance Kennedy	X										
Nat Kidder	X										
Steve Giandomenica	X										
Zachary Warnow	X										
Jennifer Chapman			X	X	X	X	X				
Paul Feucht			X	X				X			X
Aaron Golbus	X										
April Kushner	X										
Andrew Waite	X										
Brian Durkin	X										
Craig Anderson	X								X		
Ed Cortis	X										
Gerald Houlette	X										
Glenn Ruehle	X								X		
Joshua Brown	X										
Justin Hult	X										
Kevin Tatsugawa	X										
Mark Kaufmann	X										
Michael Kelley	S										

Commentor	Support	Agency	1	2	3	4	5	6	7	8	9
Wyatt Clark	X										X
Yvon Gregorian	X										
Joshua Brown	X										
Chris Ruedy	X										
Marcus Mueller	X										

Requests for accommodations may be made by calling (415) 473-4381, TTY (415) 473-2495, CRS dial 711, e-mail at [disabilityaccess@marincounty.org](mailto:disabilityaccess@marincounty.org) at least five work days in advance. Copies of documents are available in alternative formats, upon request.